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[Additional counsel listed on signature page]

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

Cung Le, Nathan Quarry, Jon Fitch, Brandon
Vera, Luis Javier Vazquez, and Kyle
Kingsbury on behalf of themselves and all
others similarly situated,

Plaintiffs,

vs.

Zuffa, LLC, d/b/a Ultimate Fighting
Championship and UFC,

Defendant.

Case No.: 2:15-cv-01045-RFB-BNW

**DECLARATION OF PATRICK F.
MADDEN, ESQ.**

1 I, Patrick F. Madden, Esq., declare and state as follows:

2 1. I am an associate at Berger Montague PC, one of the Court appointed Interim Co-Lead
3 Counsel for the proposed Classes and an attorney for Individual and Representative Plaintiffs. I am a
4 member in good standing of the State Bar of Pennsylvania and have been admitted pro hac vice in this
5 Court. I am over 18 years of age and have personal knowledge of the facts stated in this Declaration. If
6 called as a witness, I could and would testify competently to them.

7 2. I make this declaration in support of Plaintiffs' Opposition to Non-Parties Bellator Sport
8 Worldwide LLC, Golden Boy Promotions, Inc., Golden Boy Promotions, LLC, and Top Rank, Inc.'s
9 Objections to Potential Use of Confidential Information at Evidentiary Hearing (ECF NOS. 661-5, 661-
10 6, 661-8).

11 3. Attached as Exhibit 1 is a true and correct copy of excerpts of a document entitled
12 "Expert Report of Gene Deetz, CPA/ABV, ASA, CFF, September 26, 2016." This document was filed
13 in the case captioned *Golden Boy Promotions, LLC v. Alan Haymon*, Case No. 2:15-cv-03378-JFW-
14 MRW (C.D. Cal.) at ECF No. 322-13. Exhibit 1 was downloaded at my direction from the PACER
15 website for the United States District Court for the Central District of California on June 28, 2019.

16 4. Attached as Exhibit 2 is a true and correct copy of a document bearing the Bates label
17 SBPCL00002101 through SBPCL00002102. This document was produced by third party Bellator Sport
18 Worldwide LLC to Plaintiffs in discovery. This document is a true and correct copy of a document
19 entitled "Bellator Sport Worldwide LLC Unaudited Profit and Loss."

20 5. Attached as Exhibit 3 is a true and correct copy of excerpts from the deposition
21 transcript of Scott Coker, taken in this matter on August 3, 2017.

22 6. Attached as Exhibit 4 is a true and correct copy of a document bearing the Bates label
23 GBP000001, which was marked as Exhibit 8 at the deposition of Robert Blair, taken in this matter on
24 December 9, 2017. This document was produced by third party Golden Boy Promotions Inc./Golden
25 Boy Promotions, LLC to Plaintiffs in discovery. This document is a true and correct copy of a
26 document entitled "Golden Boy Promotions Profit & Loss All Transactions."

27 7. Attached as Exhibit 5 is a true and correct copy of a document bearing the Bates label
28 GBP000002, which was marked as Exhibit 9 at the deposition of Robert Blair, taken in this matter on

1 December 9, 2017. This document was produced by third party Golden Boy Promotions Inc./Golden
2 Boy Promotion LLC to Plaintiffs in discovery. This document is a true and correct copy of a document
3 entitled "Golden Boy Promotions Profit & Loss All Transactions."

4 8. Attached as Exhibit 6 is a true and correct copy of a document bearing the Bates label
5 GBP000003 through GBP0000015. This document was produced by third party Golden Boy
6 Promotions Inc./Golden Boy Promotion LLC to Plaintiffs in discovery. This document is a true and
7 correct copy of a standard promotional agreement that Golden Boy Promotions, LLC uses with its
8 fighters.

9 9. Attached as Exhibit 7 is a true and correct copy of a document bearing the Bates label
10 TR-0001 through TR-0007, which was marked as Exhibit 2 at the 30(b)(6) deposition of Robert Arum
11 on behalf of Top Rank, Inc., taken in this matter on October 17, 2017. This document was produced by
12 third party Top Rank, Inc. to Plaintiffs in discovery. This document is a true and correct copy of the
13 Declaration of David Lopez, Chief Financial Officer of Top Rank, Inc., dated October 12, 2017.

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15 I declare under penalty of perjury and the laws of the United States that the foregoing is true
16 and correct. This Declaration was executed in Philadelphia, Pennsylvania on June 28, 2019.

17 /s/ Patrick F. Madden
18 Patrick F. Madden
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